06 CIV. 3534 (LTS)

Plaintiff,

ECF CASE

-against-

NOTICE OF MOTION

COMPAGNIE ALGERO-LIBYENNE	DE
TRANSPORT MARITIME (CALTRA	M),

	Defendant.	
		X
SIRS:		

PLEASE TAKE NOTICE that Plaintiff, GENERAL NATIONAL MARITIME TRANSPORT COMPANY ("GNMTC"), by its attorneys Freehill Hogan & Mahar, LLP, upon the annexed Declaration of Fenella Tookey dated February 13, 2008, the exhibits annexed thereto, the annexed Affirmation of Michael E. Unger dated March 25, 2008, the exhibits annexed thereto, the accompanying Memorandum of Law, and the pleadings and proceedings previously had herein, will move this Court, before the Honorable Laura T. Swain, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 17C, New York, New York, on April 16, 2008 at 9:00 a.m. or as soon thereafter as counsel may be heard, for an Order recognizing and confirming the final arbitral award(s) rendered in London, England as a Judgment of this Court, together with such other, further and different relief as the Court may deem just and proper in the premises, including but not limited to an award of attorneys fees and costs incurred in the enforcement of the arbitral award.

NYDOCS1/301275,1

PLEASE TAKE FURTHER NOTICE that opposing papers, if any, must be served so as to be received by Plaintiff's counsel no later than 5:00 p.m. on April 8, 2008 and that reply papers, if any, will be served so as to be received by Defendant's counsel by 5:00 p.m. on April 15, 2008.

Dated: New York, NY March 25, 2008

> FREEHILL HOGAN & MAHAR, LLP Attorneys for Plaintiff GENERAL NATIONAL MARITIME TRANSPORT COMPANY

By:

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TO: LENNON, MURPHY & LENNON, LLC Attorneys for Defendant COMPAGNIE ALGERO-LIBYENNE DE TRANSPORT MARITIME (CALTRAM), The GrayBar Building 420 Lexington Avenue Suite 300 New York, NY 10170 Attn: Patrick F. Lennon (212) 490-6050

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